

Client Matter No. 80168.0246
Amendment Dated October 29, 2004

REMARKS/ARGUMENTS

Prior to this Amendment, claims 1-21 were pending in the application.

Claim 1 is amended to clarify the term "localized application values" as used in the computer system, e.g., values that vary, for example, by geographic location and/or by language. Similarly, independent claim 9 is amended to include the limitations of dependent claim 10, which is canceled, to distinguish the retrieval of localized application values from the mere sharing of data and/or cache among networked computers (as is the case with the Carter reference discussed below). Independent claim 18 is also amended to further define "localized application values" to more clearly claim the subject matter of the invention. No new matter is added by the amendments with support found at least in the originally filed claims.

Claims 1-9 and 11-21 remain in the application for consideration by the Examiner.

Rejections Under 35 U.S.C. §102

In the Office Action, claims 1-6, 9, 11, and 14-18 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Pat. No. 6,026,474 ("Carter"). This rejection is traversed based on the following remarks.

As discussed in the Background of the application, the invention is addressing the need for applications to use environmental variables or properties and other data that is often "localized" to a particular user and/or to a particular geographic location and language. Existing techniques for retrieving localized data typically require the "application to be aware of the location and/or identification of localization information" and often require that an application be shutdown or restarted to update to new values. In this regard, an example of how the present invention addresses these and other problems associated with prior systems is provided in the paragraph beginning at line 24, page 34. In this example, it is seen that a localized application value such as a piece of text for a web page may have a different value depending upon which language is associated with a user and where that user is physically located when accessing the application. The invention provides an effective technique for accessing

Client Matter No. 80168.0246
Amendment Dated October 29, 2004

such data throughout a network regardless of location while making a user's experience with an application consistent and personalized to the user (e.g., an application will appear and act typically will behave similarly in diverse locations used to access a network/application).

Turning to the claims, claim 1 is directed to a computer system for providing localized data to computing devices. The system includes a client device with a local memory for storing localized application values used by an application running on the client device and an administrative interface. The system further includes an application value repository that is linked to the client device via a communications network and that stores localized application values. The administrative interface is operable to receive a request from the application for application values and to respond "by selectively retrieving the localized application values corresponding to the request from the local memory and the application value repository, wherein the localized application values are selected based upon a geographical area and a language selection included in the request." Carter provides no teaching on the use of localized application values or how such "localized" data should be retrieved for an application. Hence, Carter clearly does not teach such selection should be based on a geographical area and a language selection in a request for data. As a result of these deficiencies, the rejection of claim 1 based on Carter is not supported and should be withdrawn.

More specifically, the Office Action cites Carter at "web cache, col. 2, lines 38-55; ab; fig. 7" for teaching storing localized application values used by the application. However, Carter generally teaches a system in which cache of local or client devices can be shared to create a much larger cache than would be available if each device could only use its own local memory or cache and in some cases, variables stored in such caches are shared across a network (see, for example, Carter et col. 27, lines 38-39, "The distribution file system 60 described above allows user 400 and user 420 to share their Internet browser caches" which is useful for sharing data/variables among users, too). Carter's web cache does allow sharing of variables and local memory but fails to discuss "localized application values" being stored locally at a client device. In

Client Matter No. 80168.0246
Amendment Dated October 29, 2004

other words, "localized" does not mean simply data that is locally stored (which is made clearer in further limitations discussed below).

More significantly, Carter fails to teach that an administrative interface is provided on the client device that responds to a request for application data by selectively retrieving localized application values either from the local memory or from an application value repository. The selection is done based on geographical area and language selection in the request by the administrative interface.

The Office Action points to Figure 9 for the repository but this reference is to a directory page of the Carter shared memory and does not teach storage of localized application values in a repository linked to client devices over a network. Further, the Office Action cites Carter at col. 20, lines 52-59 and at "ab; col. 5, lines 48 to col. 6, lines 10; col. 14, lines 21-51" for teaching selective retrieval of the localized application values based on the geographic area and language selection in the request. In col. 20, Carter discusses performing a memory operation which may be used to obtain data from the network shared web cache or the like, but Carter fails to teach retrieving localized application values based on geographic area and language. In cols. 5, 6, and 14, Carter discusses accessing a file system distributed across devices in a network but does not teach selectively retrieving localized application values from local memory or a repository or doing such retrieval based on a geographic area or language selection in the request. Hence, Carter does not teach or suggest each element of claim 1, and claim 1 is allowable over Carter.

Claims 2-6 depend from claim 1 and are believed allowable as depending from allowable base claim.

Independent claim 9 is directed to a method with limitations similar to that of claim 1 and is believed allowable at least for the reasons for allowing claim 1. Further, claim 9 calls for the request from the application to include "an application name, a geographical area code, a language code, and at least one element name which are used in the retrieving steps to provide localized application values matching the geographical area code and the language code." The Office Action in rejecting claim

Client Matter No. 80168.0246
Amendment Dated October 29, 2004

10 cites U.S. Pat. No. 6,360,273 ("Beurket") for teaching such a request and its use in retrieving matching localized application values for an application. Beurket is cited at col. 2, lines 56-67 and col. 4, line 50 to col. 5, line 15. Beurket at these citations appears to discuss converting data from one language to another and converting units and other data. However, Beurket is not teaching that an application request will identify an application, a geographical area, and a language code which are then used during retrieving to selectively retrieve the correct/matching localized application values for an application. Such retrieval does not involve conversions because the localized values are stored in local memory or in a repository (and may not be a direct one-to-one conversion or translation) and are retrieved based on geographic or other identifiers of localized information. Hence, a rejection of claim 9 based on Carter and/or Beurket is not supported, and claim 9 is allowable for this additional reason.

Claims 11 and 14-17 depend from claim 9 and are believed allowable at least for the reasons for allowing claim 9.

Independent claim 18 is directed to an interface for providing localized data to an application. Claim 18 includes limitations similar to those of claim 1 and 9, and the reasons provided for allowing claims 1 and 9 are believed equally applicable to claim 18.

Rejections Under 35 U.S.C. §103

Additionally, in the Office Action, claims 7, 8, 10, 12, 13, and 19-21 were rejected under 35 U.S.C. §103(a) as being unpatentable over Carter in view of Beurket. This rejection is traversed based on the following remarks.

Claims 7 and 8 depend from claim 1 and are believed allowable as depending from an allowable base claim. Further, Beurket fails to overcome the deficiencies of Carter discussed previously with reference to claim 1, and particularly, Beurket fails to teach selective retrieval of localized application values based on geographic and language information included in an application data request. Additionally, claim 7 calls for the localized application values to include user roles which can vary based on geographical location and the retrieval by the administrative interface can vary based

Client Matter No. 80168.0246
Amendment Dated October 29, 2004

on the user role. The Office Action cites Beurket for teaching this limitation, but Applicant could find no discussion in Beurket of a "user role" or that such a role may vary based on geographical location. Applicant respectfully requests that a specific citation be provided for teaching the user roles and related limitations of claim 7 or that this rejection be withdrawn.

Claims 12 and 13 depend from claim 9 and are believed allowable as depending from an allowable based claim. Further, claim 13 calls for populating to include obtaining a geographical hierarchy (see, for example, Figure 3) and populating a data structure for localized application values by beginning at a supplied geographical area node and progressing upward in the hierarchy. The Office Action merely states that the limitations of claim 13 were addressed in earlier analysis of the Office Action but claims 13 is the first claim to specifically call for data structure populating using a geographical hierarchy. Applicant has reviewed Carter and Beurket but could find no mention of such populating or the use of a geographical hierarchy to create a data structure for localized application values. Hence, claim 13 is believed allowable for this additional reason.

Independent claim 19 is directed to a computer readable medium containing a data structure according to the Applicant's invention. The data structure includes limitations similar to that of claim 1 and is believed allowable for the reasons for allowing claim 1. Claim 20 depends from claim 19 and includes limitations similar to that of claim 13, and the reasons for allowing claim 13 are applicable to claim 20. Claim 21 depends from claim 20 and adds the concept of user roles and access "based on the staged or released value." No citation is provided in the Office Action for this concept of the invention, and hence, claim 21 is allowable because a *prima facie* case of obviousness was not presented in the Office Action.

Client Matter No. 80168.0246
Amendment Dated October 29, 2004

Conclusions

The references made of record but not relied upon have been considered but are believed no more relevant than Carter and Beurket.

In view of all of the above, the claims are now believed to be allowable and the case in condition for allowance which action is respectfully requested.

No fee is believed due for this submittal. However, any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

Respectfully submitted,

October 29, 2004



Kent A. Lembke, No. 44,866
Hogan & Hartson LLP
One Tabor Center
1200 17th Street, Suite 1500
Denver, Colorado 80202
(720) 406-5378 Tel
(720) 406-5301 Fax